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March 12, 2021

Hon. Peggy Kuo
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Jonathan Rubenstein
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Re: *NOVAGOLD Resources Inc. v. J Capital Research USA LLC*, No. 20-cv-02875-LDH-PK; Joint Status Report

Dear Magistrate Judge Kuo:

The parties write jointly to provide a status report on the progress of discovery pursuant to Your Honor's November 10, 2020 Order. Since the Court's entry of a discovery plan, the parties have worked together to move discovery forward. The parties have exchanged Rule 26 initial disclosures and respective first sets of requests for production and interrogatories. The parties have answered interrogatories and responded to the other sides' requests for production. The parties have met and conferred once in an effort to narrow existing discovery disputes, and the parties are committed to continuing that process. NOVAGOLD also has made an initial production of documents and intends to continue production on a rolling basis as the parties work to resolve outstanding disputes. J Capital Research does have a concern about the timing and scope of discovery and the impact that a ruling on the pending substantive motion may have on discovery and costs. To the extent that the parties are unable to resolve their remaining issues, the parties will aim to submit a joint discovery letter to Your Honor pursuant to Individual Practice Rule VI(A)(1) by the end of this month.

Respectfully,

/s/ Jonathan Rubenstein

Jonathan Rubenstein
Counsel for Plaintiff NOVAGOLD Resources, Inc.

/s/ David Korzenik

David Korzenik
Counsel for Defendant, J Capital Research USA, LLC